

# TRAUB LIEBERMAN

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December 22, 2022

**VIA FAX and ECF**

Hon. Victor Marrero  
United States District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Loren M. Ridinger, individually and on behalf of the Estate of James Ridinger, and Milagro Yacht Charters LLC v. Ralph K. Stone, Rachel L. Gould and Meister Seelig & Fein LLP*  
Docket No.: 22-cv-09082-VM

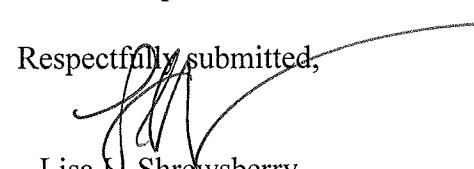
Honorable Sir:

We represent the defendants in the above-referenced matter. The Complaint herein was filed on October 24, 2022, and we waived service on behalf of the defendants on October 27, 2022, setting the due date for defendants' response to the Complaint at December 27, 2022.

By letter dated November 18, 2022, and pursuant to Your Honor's Individual Rule II(B)(1), we advised the plaintiffs and the Court of the bases of our intended motion to dismiss the Complaint. By letter dated December 2, 2022, plaintiffs responded by, *inter alia*, advising that they planned to delete a plaintiff and amend the Complaint by changing the main focus of their claim from negligence to fraud. Plaintiffs' counsel advised of plaintiffs' intent to seek leave to amend the pleading by email dated December 14, 2022, and reiterated such intent on December 21, 2022, but they have not yet made any move to do so.

Based upon the foregoing, and in light of the upcoming due date of our response to plaintiffs' original Complaint, we hereby request that the due date of December 26, 2022 be extended to allow for plaintiffs to seek leave to amend the Complaint, so that we may utilize our resources to address the planned Amended Complaint.

Respectfully submitted,



Lisa L. Shrewsberry

cc: Via ECF

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